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IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:

ASHRAFUL M. ISLAM, : CHAPTER 13

:

Debtor. : BANKRUPTCY NO. 22-13182-amc

UNCONTESTED MOTION TO TERMINATE APPOINTMENT OF FORMERLY APPOINTED REAL ESTATE BROKER/AGENT AND APPLICATION FOR NEW APPOINTMENT AS A REAL ESTATE BROKER/AGENT

The Debtor hereby requests that the Court approve termination of the appointment of real estate brokerage, AMERICAN FOUR SQUARE REALTY LLC, and real estate agent, RICHARD STRAHM, by agreement (see fully executed "CHANGE TO LISTING AGREEMENT" attached hereto and incorporated herein, marked as Exhibit "A").

The Debtor also requests that the Debtor be authorized to list and real estate brokerage, WEICHERT REALTORS, and realtor, JENNA CUTILLI, be employed as a real estate brokerage/agent to sell the real estate of the Debtor located at 404 Doylestown Pike, Montgomeryville, PA 18936 (hereinafter "the Property"). (*See* Listing Contract attached hereto and incorporated herein, marked as Exhibit "B".)

The initial listing price for the Property is \$595,000, which may be adjusted by agreement between the real estate brokerage/agent and the Debtor, and which will be sold pursuant to the Listing Contract and upon Court approval of any prospective sale of the Property, with the commission to be received being six percent (6%) of the selling price.

A Verified Statement by JENNA CUTILLI, pursuant to 11 U.S.C. §327 and Federal Rule of Bankruptcy Procedure 2014, is attached hereto and incorporated herein, marked as Exhibit "C".

Any objection to the Application must be served upon the Debtor's counsel listed below and filed with the Clerk of Court within seven (7) days of the filing of this Application, or on or before May 11, 2023.

Respectfully submitted, REGIONAL BANKRUPTCY CENTER OF SOUTHEASTERN PA, P.C., by:

Roger V. Ashodian Attorney ID #42586 101 West Chester Pike, Suite 1A Havertown, PA 19083 (610) 446-6800

Attorney for Debtor